

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington, DC 20554

In the Matter of )

Section 63.71 Application of )  
 SBC Long Distance, LLC d/b/a )  
 AT&T Long Distance and )  
 SNET America d/b/a AT&T Long )  
 Distance East )

For Authority Pursuant to Section 214 of )  
 The Communications Act of 1934, As Amended, )  
 To Discontinue the Provision of Service )

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*ND-2011-3-C*

**SECTION 63.71 APPLICATION OF SBC LONG DISTANCE, LLC and SNET  
 AMERICA, INC.**

SBC Long Distance L.L.C. d/b/a AT&T Long Distance and SNET America, Inc. d/b/a AT&T Long Distance East (collectively referred to herein as "AT&T LD"), apply for authority under Section 214(a) of the Communications Act, as amended ("the Act"), 47 U.S.C. § 214, and Section 63.71 of the Federal Communications Commission's ("Commission") rules, 47 C.F.R. §63.71, to discontinue the provision of the following interstate services: Enhanced Toll Free Service, Dedicated Toll Free Service, International Toll Free Service, Dedicated Voice Access, Primary Rate Interface, and Long Distance Virtual Private Network.

As required by Section 63.71(a) and (b) of the Commission's rules, AT&T LD is providing the following information:

**Name and Address of Carriers (47 C.F.R. §§ 63.71(a)(1), (b)(2)):**

SBC Long Distance LLC d/b/a AT&T Long Distance  
 SNET America, Inc. d/b/a AT&T Long Distance East  
 2000 W. AT&T Center Drive – Z1  
 Hoffman Estates, IL 60192

**Date of Planned Service Discontinuance (47 C.F.R. §§ 63.71(a)(2), (b)(2)):**

AT&T LD plans to discontinue offering this service to new customers on or after March 31, 2011 and plans to discontinue providing these services to existing customers on or after June 30, 2011 subject to Commission authorization of the discontinuance pursuant to 47 C.F.R. § 63.71(c).

**Points of Geographic Areas of Service Affected (47 C.F.R. §§ 63.71(a)(3), b(2)):**

These services will be discontinued throughout the continental United States (including the District of Columbia), Alaska and Hawaii.

**Brief Description of Type of Service Affected (47 C.F.R. §§ 63.71(a)(3), b(2)):**

**Enhanced Toll Free Service, Dedicated Toll Free Service, and International Toll Free Service** provide a suite of complex Toll-Free features and functionality for Business Customers with advanced toll-free applications.

**Dedicated Voice Access** provides a path between the Customer's Premises/Customer's equipment and the Company-designated POP. The access facility has Bandwidth capacity of either 1.544 Mbps or 44.736 Mbps utilizing in-band signaling.

**Primary Rate Interface** provides high-speed end-to-end digital service with out-of-band signaling. Each PRI-ISDN utilizes a 1.544 Mbps facility and is assigned a PRI-port to carry Company-Provided dedicated voice Services, either dedicated toll free Services and/or dedicated outbound (1+) Services.

**Long Distance Virtual Private Network** is an outbound only long distance service that provides the functionality and capabilities of a private network through the use of shared transmission facilities and is operated by a software controlled management system.

AT&T continues to streamline its service portfolio as a result of the mergers of SBC Communications Inc. and AT&T Corp. Here, the services being discontinued by AT&T LD are provided via legacy technology that is being replaced by the industry with IP technology and similar products are offered by AT&T Corp., an affiliate of AT&T LD. As a result, the public convenience and necessity will not be impaired by this service discontinuance because there are many alternative providers of these services, including AT&T Corp.

**Brief Description of the Dates and Methods of Notice to All Affected Customers (47 C.F.R.**

**§ 63.71(b)(3)):**

AT&T LD notified existing customers by letter sent via U.S. Mail on February 2, 2011.

A copy of the letter is attached hereto as Attachment A.

Copies of this Application are being sent, first class U.S. Mail, to the public utilities commissions and governors of the states affected and also to the Special Assistant for Telecommunications to the Secretary of Defense, as required by 63.71(a) of the Commission's rules.

**Regulatory Classification of Carrier (47 C.F.R. § 63.71(b)(4)):**

The AT&T LD entities are non-dominant service providers.

Questions about this application may be addressed to Toni Acton, AT&T Services, Inc., Director – Federal Regulatory, 1120 20<sup>th</sup> Street, NW, Suite 1000, Washington, DC 20036, (202) 457-3039.

**Conclusion:**

The public convenience and necessity will not be adversely affected by the discontinuance of this service since there are alternative providers of these services including as affiliate of AT&T. AT&T LD respectfully requests that the Commission approve its Section 63.71 Application to discontinue Enhanced Toll Free Service, Dedicated Toll Free Service, International Toll Free Service, Dedicated Voice Access, Primary Rate Interface, and Long Distance Virtual Private Network.

Respectfully submitted,

By: /s/ Terri L. Hoskins

Terri L. Hoskins  
Gary L. Phillips  
Paul K. Mancini

AT&T Inc.  
1120 20<sup>th</sup> Street, N.W.  
Washington, D.C. 20036

(202) 457-3047 – Tel. No.  
(202) 457-3073 – Fax. No.

*Its Attorneys*

February 4, 2011

## **Attachment A**



2000 W AT&T Center Dr -- Z1  
Hoffman Estates, IL 60192

February 2, 2011

<Business Name>  
ATTN: <invoice recipient>  
<Address Line 1>  
<City>, <State> < Zip>

**Important Notice Regarding Discontinuance of Long Distance Dedicated Voice Services Provided by  
SBC Long Distance, LLC d/b/a AT&T Long Distance and SNET America, Inc.  
d/b/a AT&T Long Distance East  
Effective 6/30/2011**

Thank you for using AT&T for your business service needs. We want to make you aware of planned changes to your AT&T Long Distance and AT&T Long Distance East Dedicated Services, which require your coordination and action in the very near future.

Effective March 31, 2011, pending regulatory approval, the following Dedicated Services will no longer be available to new customers in the continental United States, the District of Columbia, Alaska and Hawaii. In addition, triggered by the growth of newer technologies, like Voice over Internet Protocol (VoIP), these Dedicated Services will be **discontinued and withdrawn for all existing customers on or after June 30, 2011:**

- SBC Long Distance Dedicated Voice Access 6 Pack & 12 Pack (DVA)
- SBC Long Distance Primary Rate Interface (PRI)
- SBC Long Distance and SAI Outbound Dedicated Voice Access Services
- SBC Long Distance and SAI Inbound Dedicated Voice Access Services, including:
  - Dedicated Toll Free Service (DTFS)
  - Enhanced Toll Free Service (ETFS)
  - International Toll Free Service (ITFS)
- SBC Long Distance Virtual Private Network (VPN)

Though we plan to discontinue these Dedicated Services, we value your business and your AT&T Account Executive is ready to provide attractive replacement services from the AT&T Voice product set, delivered on our world-class AT&T Network. For replacement services, we strongly encourage you to consider our IP (Internet Protocol) services, such as IP Flex. However, if you prefer a more traditional approach, please consider our AT&T Business Network (ABN) offers. Our goal is to transition you to a new service in a manner that is seamless to your business!

**If your term agreement ends after June 30, 2011, you will need to replace your existing AT&T Long Distance Dedicated Services by the expiration of your current agreement.** Continuing service on a month-to-month basis will not be permitted; in addition, term renewals will not be permitted unless your agreement requires otherwise.

(Continued)

To support you in your migration to another AT&T service, we have established support resources which your Account Executive will engage to ensure a smooth transition. AT&T's migration program also offers the following:

- Waiver of service installation charges for new AT&T service.
- Inside Wire & onsite test & turn-up support provided at no additional charge if required due to provisioning of new local access.
- Coordination of billing start/stop dates to ensure no overlapping charges for migrating services.

If you are no longer on a term agreement, or will not be by June 30, 2011, then to ensure service continuity, **it is recommended that you transition to an alternate AT&T service arrangement by June 1, 2011.** In any case, your AT&T Account Team is ready to discuss your business needs for this service migration.

AT&T regrets any inconvenience the discontinuance of AT&T Long Distance and AT&T Long Distance East Dedicated Services may cause, and will work with you to make your transition to a new service arrangement as smooth as possible.

Sincerely,

George Plotzke  
Director - Product Management  
AT&T Operations, Inc.

**AT&T is required by the FCC to provide the following statement:**

The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the section 63.71 Application of SBC Long Distance, Inc. d/b/a AT&T Long Distance Service and SNET America, Inc. (SAI) d/b/a AT&T Long Distance -East. Comments should include specific information about the impact of this proposed discontinuation (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

Please do not send inquiries or payments to the return address on the envelope. If you have comments or questions, please contact AT&T Customer Service at the toll-free number on your bill.

SV21667

**CERTIFICATE OF SERVICE**

I do certify that I have, on this 4th day of February 2011, served a copy of the foregoing  
Section 63.71 Application by U.S. Mail postage prepaid to the addresses on the following sheets:

/s/Lacretia Hill  
Lacretia Hill

**Alabama Public Service Commission  
100 N. Union Street  
Suite 850  
Montgomery, AL 36130**

**Governor Robert Bentley  
State Capitol  
600 Dexter Avenue  
Montgomery, AL 36130**

**Arizona Corporation Commission  
Commissioners Wing  
1200 West Washington  
Phoenix, AZ 85007-2996**

**The Honorable Jan Brewer  
Governor of Arizona  
1700 West Washington  
Phoenix, Arizona 85007**

**Arkansas Public Service Commission  
P.O Box 400  
Little Rock, AR 72203-0400**

**Governor Mike Beebe  
Governor's Office  
State Capitol Rm. 250  
Little Rock, AR 72201**

**Governor Jerry Brown  
Governor's Office  
State Capitol Building  
Sacramento, California 958 14**

**Michael R. Peevey  
President, California Public Utilities  
Commission  
Headquarters Office  
505 Van Ness Avenue  
San Francisco, CA 94 102-3298**

**Colorado Public Utilities Commission  
1560 Broadway  
Suite 250  
Denver, CO 80202**

**John Hickenlooper, Governor  
136 State Capitol  
Denver, CO 80203-1792**

**Governor Dannel P. Malloy  
Office of the Governor  
State Capitol  
210 Capitol Avenue  
Hartford, Connecticut 06 106**

**Connecticut Department of Public Utilities  
Control  
Ten Franklin Square  
New Britain, CT 0605 1**

**Delaware Public Service Commission  
861 Silver Lake Boulevard  
Cannon Building, Suite 1000  
Dover, DE 19904**

**Governor Jack Markell  
Tatnall Building  
William Penn Street, 2<sup>nd</sup> Floor  
Dover, DE 19901**

**District of Columbia  
Public Service Commission  
1333 H Street, NW  
Suite 200, West Tower;  
Washington, DC 20005**

**Mayor Vincent Gray  
Office of the Mayor  
John A. Wilson Building  
1350 Pennsylvania Avenue, NW  
Washington, DC 20004**

**Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850**

**Governor Rick Scott  
Office of the Governor  
The Capitol  
Tallahassee, FL 32399-0001**

**Governor Nathan Deal  
Georgia State Capitol  
Atlanta, GA 30334**

**Georgia Public Service Commission  
244 Washington Street, SW  
Atlanta, GA 30334**

**Idaho Public Utilities Commission  
472 W. Washington Street  
Boise, ID 83720-0074**

**Office of the Governor  
P.O. Box 83720  
Boise, Idaho 83720**

**Governor Pat Quinn  
Office of the Governor  
207 State House  
Springfield, Illinois 62706**

**Illinois Commerce Commission  
527 East Capitol Ave  
Springfield, IL 62701**

**Governor Mitch Daniels  
Office of the Governor  
Statehouse  
Indianapolis, Indiana 46204**

**Indiana Utility Regulatory Commission  
PNC Center  
101 West Washington Street  
Suite 1500 East  
Indianapolis, IN 46204**

**Office of the Governor & Lt. Governor  
State Capitol  
1007 East Grand Ave.  
Des Moines, IA 50319**

**Iowa Utilities Board  
1375 E. Court Ave  
Room 69  
Des Moines, IA 50319**

**Governor Sam Brownback  
Office of the Governor  
Capitol, 300 SW 10th Ave., Ste. 241s  
Topeka, Kansas 666 12- 1590**

**Kansas Corporation Commission  
Commissioners, Utilities Division, Motor  
Carriers, Pipeline Safety and Energy  
1500 SW Arrowhead Road  
Topeka, KS 66604-4027**

**Governor Steve Beshear  
700 Capital Avenue  
Suite 100  
Frankfort, KY 40601**

**Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, KY 40601**

**Louisiana Public Service Commission  
Galvez Building, 12th Floor  
602 North Fifth Street  
P.O. Box 91154  
Baton Rouge, LA 70821**

**Office of the Governor  
P.O. Box 94004  
Baton Rouge, LA 70804-9004**

**Governor Deval Patrick  
Office of the Governor  
Room 280  
Boston, MA 02133**

**Office of Consumer Affairs and Business  
Regulation  
10 Park Plaza, Suite 5170  
Boston, MA 02116**

**Governor Martin O'Malley  
State House, 100 State Circle  
Annapolis, MD 21401**

**Maryland Public Service Commission  
William D. Schaefer Tower  
6 St. Paul Street, 16th Fl  
Baltimore, MD 21202**

**Office of the Governor  
1 State House Station  
Augusta, ME 04333-0001**

**Maine Public Utilities Commission  
State House Station 18  
Augusta, ME 04333**

**Michigan Public Service Commission  
P.O. Box 30221  
Lansing, MI 48909**

**Governor Rick Snyder  
P.O. Box 30013  
Lansing, Michigan 48909**

**Minnesota Public Utilities Commission  
121 7th Place East  
Suite 350  
Saint Paul, MN 55101**

**Office of the Governor  
130 State Capitol  
75 Rev. Dr. Martin Luther King Jr. Blvd.  
Saint Paul, MN 55155**

**Governor Haley Barbour  
P.O. Box 139  
Jackson, MS 39205**

**Mississippi Public Utilities Commission  
Woolfolk Building  
501 North West Street  
Jackson, MS 39201**

**Missouri Public Service Commission  
Public Information Office  
Governor Office Building  
200 Madison Street  
PO Box 360  
Jefferson City, MO 65102-0360**

**Governor Jay Nixon  
Office of the Governor  
Room 2 16, State Capitol Building  
Jefferson City, Missouri 65 101**

**Governor Brian A. Schweitzer  
Office of the Governor  
Montana State Capitol Bldg.  
P.O. Box 200801  
Helena, MT 59620**

**Public Service Commission  
1701 Prospect Avenue  
P.O. Box 202601  
Helena, MT 59620**

**Nebraska Public Service Commission  
1200 N Street, Suite 300  
Lincoln, NE 68508**

**Office of the Governor  
P.O. Box 94848  
Lincoln, NE 68509-4848**

**Governor Brian Sandoval  
State Capitol  
101 N. Carson Street  
Carson City, NV 89701**

**Public Utilities Commission of Nevada  
1150 E. William Street  
Carson City, NV 89701**

**New Hampshire Public Utilities  
Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301-2429**

**Governor John Lynch  
Office of the Governor  
State House  
25 Capitol Street  
Concord, NH 03301**

**Governor Chris Christie  
P.O. Box 001  
Trenton, NJ 08625**

**New Jersey Board of Public Utilities  
Two Gateway Center 8<sup>th</sup> Floor  
Newark, NJ 07102**

**New Mexico Public Regulation Commission  
1120 Pasco De Peralta  
P.O. Box 1269  
Santa Fe, NM 87501**

**Office of the Governor  
490 Old Santa Fe Trail  
Room 400  
Santa Fe, NM 87501**

**Governor Andrew M. Cuomo  
State Capitol  
Albany, NY 12224**

**New York State Public Service Commission  
Empire State Plaza  
Agency Building 3  
Albany, NY 12223-1350**

**North Carolina Utilities Commission  
430 North Salisbury Street  
Dobbs Building  
Raleigh, NC 27603-5918**

**Governor Beverly Perdue  
Office of the Governor  
20301 Mail Service Center  
Raleigh, NC 27699-0301**

**North Dakota Public Service Commission  
600 E. Boulevard, Dept. 408  
Bismarck, ND 58505**

**Governor Jack Dalrymple  
Dept. 101  
600 E. Boulevard Ave.  
Bismarck, ND 58505**

**Governor John R. Kasich  
30th Floor  
77 South High Street  
Columbus, Ohio 43215-6108**

**Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, Ohio 43215**

**Oklahoma Corporation Commission  
P.O. Box 52000  
Oklahoma City, OK 73152-2000**

**Governor Mary Fallin  
State Capitol Building  
2300 N. Lincoln Blvd., Room 212  
Oklahoma City, Oklahoma 73105**

**Governor John Kitzhaber  
160 State Capitol  
900 Court Street  
Salem, Oregon 97301-4047**

**Public Utility Commission of Oregon  
550 Capitol St NE #215  
PO Box 2148  
Salem OR 97308-2148**

**Governor Tom Corbett's Office  
225 Main Capitol Building  
Harrisburg, Pennsylvania 17120**

**Pennsylvania Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265**

**Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888**

**Governor Lincoln D. Chafee  
Office of the Governor  
State House, Room 115  
Providence, RI 02903**

**Public Service Commission of South  
Carolina,  
101 Executive Center Dr., Suite 100  
Columbia, SC 29210**

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Office of the Governor  
P.O. Box 12267  
Columbia, SC 29211**

**Public Utilities Commission  
Capitol Building, 1st floor  
500 East Capitol Avenue  
Pierre, SD 57501-5070**

**Governor Dennis Daugaard  
Office of the Governor  
500 E. Capitol Ave.  
Pierre, SD 57501**

**Governor Bill Haslam  
Governor's Office  
Tennessee State Capitol  
Nashville, TN 37243-0001**

**Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505**

**Public Utilities Commission of Texas  
1701 N. Congress Avenue  
PO Box 13326  
Austin, TX 78711-3326**

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Office of the Governor  
P.O. Box 12428  
Austin, Texas 78711 -2428**

**Governor Peter Shumlin  
109 State Street, Pavilion  
Montpelier, VT 05609-0101**

**Vermont Public Service Board  
112 State Street (Chittenden Bank Building)  
4<sup>th</sup> floor  
Montpelier, VT 05620-2701**

**Virginia State Corporation Commission  
Tyler Building,  
1300 E. Main Street  
Richmond, Virginia 23219**

**Governor Bob McDonnell  
Office of the Governor  
Patrick Henry Building, 3rd Floor  
1111 East Broad Street  
Richmond, Virginia 23219**

**Governor Christine Gregoire  
Office of the Governor  
PO Box 40002  
Olympia, WA 98504-0002**

**Washington Utilities and Transportation  
Commission  
PO Box 47250  
Olympia, WA 98504-7250**

**Governor Earl Ray Tomblin  
1900 Kanawha Blvd, East  
Charleston, WV 25305**

**West Virginia Public Service Commission  
201 Brooks Street  
P.O. Box 812  
Charleston, WV 25323**

**Wyoming Public Service Commission  
Hansen Building  
215 Warren Avenue  
Suite 300  
Cheyenne, WY82002**

**Governor Matt Mead  
Governor's Office  
State Capitol, 200 West 24th Street  
Cheyenne, WY 82002-0010**

**Public Service Commission of Wisconsin  
610 North Whitney Way. P.O . Box 7854  
Madison, Wisconsin 53707-7854**

**Governor Scott Walker  
Madison Office  
P.O. Box 7863  
Madison, WI 53707**

**Secretary of Defense  
Attn: Special Asst. for Telecommunications  
Pentagon  
Washington, D.C. 20301**

**Utah Division of Public Utilities  
Box 146751  
Salt Lake City, UT 84114-6751**

**Gov Gary R. Herbert  
State Capitol Complex  
East Office Building, Suite E220  
PO Box 142220  
Salt Lake City, Utah 84114-2220**

**Hawaii Public Utilities Commission  
465 South King Street, Room 103  
Honolulu, Hawaii 96813**

**Gov. Neil Abercrombie  
Governor, State of Hawaii  
Executive Chambers  
State Capitol  
Honolulu, Hawaii 96813**

**Regulatory Commission of Alaska  
701 West 8th Avenue  
Suite 300  
Anchorage, AK 99501-3469**

**Gov. Sean Parnell  
Governor of Alaska  
P.O. Box 110001  
Juneau, AK 99811-0001**